

THE HONORABLE RICARDO S. MARTINEZ

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

BERNADETTE HIGHTOWER, LATERSHIA  
JONES, GEORGE DEAN, and BRUCE MARK  
WOODRUFF, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

RECEIVABLES PERFORMANCE  
MANAGEMENT, LLC,

Defendant.

Case No. 2:22-cv-01683-RSM

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME FOR  
DEFENDANT TO ANSWER AMENDED  
CONSOLIDATED CLASS ACTION  
COMPLAINT AND TO SUBMIT INITIAL  
DISCLOSURES AND JOINT STATUS  
REPORT AND CASE MANAGEMENT  
PLAN**

**NOTE ON MOTION CALENDAR: March  
29, 2024**

**I. STIPULATION**

Pursuant to Local Rules 7(j) and 10(g), Plaintiffs Bernadette Hightower, Latershia Jones, George Dean, and Bruce Mark Woodruff, individually and on behalf of all others similar situated (“Plaintiffs”) and Defendant Receivables Performance Management, LLC (“Defendant”) hereby respectfully submit this stipulated motion for an extension of time for Defendant to answer, move or otherwise respond to Plaintiffs’ Consolidated Amended Class Action Complaint and for

1 an extension of time to submit Initial Disclosures and Joint Status Report and Discovery Plan,  
2 and in support thereof, state as follows:

3 1. Plaintiffs filed their Amended Consolidated Class Action Complaint on May 4,  
4 2023. ECF No. 42.

5 2. Defendant's current due date for responding to Plaintiffs' Consolidated Class  
6 Action Complaint is March 29, 2024. ECF No. 55.

7 3. Additionally, the Court has set the following deadlines for initial disclosures and  
8 submission of the Joint Status Report and Discovery Plan: 1) Deadline for FRCP 26(f)  
9 Conference: April 5, 2024; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): April 12, 2024;  
10 and (3) Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) and  
11 Local Civil Rule 26(f): April 19, 2024. ECF No. 55.

12 4. As set forth in the Parties' motion to amend complaint and for an extension of  
13 time for Defendant to respond to the Amended Consolidated Class Action Complaint (ECF  
14 No. 52), the Parties agreed to discuss the possibility of an early resolution, including the  
15 exchange of information to allow the Parties to evaluate the strengths and weaknesses of  
16 Plaintiffs' claims and Defendant's defenses, as well as the scheduling of a mediation before  
17 Hon. Wayne Andersen (Ret.). This mediation was conducted on July 12, 2023. ECF No. 45.

18 5. The Parties continue to discuss early resolution of this matter with the assistance  
19 of Hon. Wayne Anderson (Ret.). The Parties are in the final stages of settlement discussions  
20 with the assistance of the mediator and anticipate finalizing discussions in the next three (3)  
21 weeks.  
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23 6. In light of the above, the Parties stipulate and agree that good cause exists for an  
24 extension as stipulated herein and that it would be beneficial to further extend the time for  
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1 Defendant to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended  
2 Complaint.

3 7. If the Parties are able to resolve the matter before Defendant's deadline to answer,  
4 move or otherwise respond to Plaintiffs' Consolidated Amended Complaint, the Parties will  
5 promptly advise the Court and request appropriate deadlines for implementation of any  
6 agreed-upon settlement.

7  
8 8. As such, in light of the above and subject to Court approval, the Parties stipulate  
9 and agree that Defendant shall have an extension of time up to and including April 19, 2024  
10 to answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class Action  
11 Complaint.

12 9. Moreover, the Parties stipulate and agree, subject to Court approval, that the  
13 deadlines for initial disclosures and submission of the Joint status Report and Discovery Plan  
14 be extended as follows: (1) Deadline for FRCP 26(f) Conference: April 26, 2024; (2) Initial  
15 Disclosures Pursuant to FRCP 26(a)(1): May 3, 2024; and (3) Combined Joint Status Report  
16 and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): May 10, 2024.

17  
18 WHEREFORE, the Parties respectfully request that this stipulated motion be granted and that  
19 Defendant be granted an extension as stipulated and agreed herein.

20 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD on this 29<sup>th</sup> day of March,  
21 2024.  
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**ORDER**

It is so ORDERED:

Defendant shall answer, move, or otherwise respond to Plaintiffs' Consolidated Amended Class Action Complaint on or before April 19, 2024.

The deadlines for initial disclosures and submission of the Joint Status Report and Discovery Plan per ECF No. 51 are extended as follows: (1) Deadline for FRCP 26(f) Conference: April 26, 2024; (2) Initial Disclosures Pursuant to FRCP 26(a)(1): May 3, 2024; and (3) Combined Joint Status Report and Discovery Plan as required by FRCP 26(f) and Local Civil Rule 26(f): May 10, 2024.

DATED this 1<sup>st</sup> day of April, 2024.



RICARDO S. MARTINEZ  
UNITED STATES DISTRICT JUDGE